

### REMARKS

In an Office Action mailed on April 19, 2002, an objection was made to the title as not being descriptive; and claims 1-15 were rejected under 35 U.S.C. § 102(e) as being anticipated by Zandi. The title has been amended to overcome the objection to the title. The rejections of the claims are discussed in the corresponding sections below.

A marked-up version of the amended claims is submitted as a separate document. The undersigned has endeavored to ensure that the clean and marked-up versions of the amended claims correspond. However, the Examiner is specifically requested to verify that these two versions of the claims are consistent.

#### Rejections of Claims 1-6:

The method of claim 1 includes providing wavelet coefficients that indicate an image. Each wavelet coefficient is represented as a collection of ordered bits, and the bits of each order are coded to indicate zerotree roots that are associated with the order.

In contrast, Zandi teaches zerotree encoding coefficients, not representing each wavelet coefficient as a collection of ordered bits and coding the bits of each order to indicate zerotree roots that are associated with the order. In this manner, the Examiner refers to the discussion in Zandi beginning on line 59 of column 22 and ending on line 25 of column 27. However, this discussion relates to zerotree encoding of coefficients. Although beginning on line 27 of column 24 Zandi discusses determining whether a particular coefficient is a zerotree root based on a most significant bit  $S_A$ , Zandi neither teaches nor suggests coding the bits of each order of the coefficient. In this manner, Zandi teaches analyzing the most significant bit to determine whether the coefficient should be classified in the A-group or B-group. However, Zandi neither teaches nor suggests coding the bits of each order of a particular coefficient to indicate zerotree roots.

Thus, claim 1 overcomes the § 102 rejection in view of Zandi. Claims 2-6 are patentable for at least the reason that these claims depend from an allowable claim.

#### Rejections of Claims 7-11:

The article of claim 7 includes a storage medium that is readable by a processor-based system. The storage medium stores instructions to cause a processor to provide wavelet coefficients that indicate an image, represent each wavelet coefficient as a collection of ordered bits and code the bits of each order to indicate zerotree roots that are associated with the order.

To the contrary, Zandi neither teaches nor suggests instructions to cause a processor to code bits of each order of a wavelet coefficient to indicate zerotree roots that are associated with the order. In this manner, as discussed above, Zandi discusses analyzing a most significant bit of a particular coefficient for purposes of classifying the coefficient as a zerotree root. However, Zandi neither teaches nor suggests instructions to cause a processor to code the bits of each order of the coefficient to indicate zerotree roots.

Thus, claim 7 overcomes the § 102 rejection in view of Zandi. Claims 8-11 are patentable for at least the reason that these claims depend from an allowable claim.

#### Rejections of Claims 12-15:

The computer system of claim 12 includes a processor and a memory. The memory stores a program to cause the processor to provide wavelet coefficients that indicate an image, represent each favorite coefficient as a collection of ordered bits and code the bits of each order to indicate zerotree roots that are associated with the order.

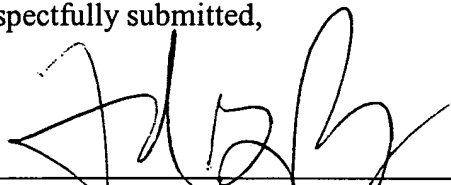
As discussed above, Zandi neither teaches nor suggests a memory that stores a program to cause a processor to code the bits of each order of a particular coefficient to indicate zerotree roots that are associated with the order. Thus, for at least this reason, claim 12 overcomes the § 102 rejection in view of Zandi.

Claims 13-15 are patentable for at least the reason that these claims depend from an allowable claim.

CONCLUSION

In view of the foregoing, the Assignee requests withdrawal of the objection to the title, withdrawal of § 102 rejections of claims 1-15 and a favorable action in the form of a Notice of Allowance. The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 20-1504 (ITL.0210US (P7057)).

Respectfully submitted,



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